

[Skip to Main Content](#) [Logout](#) [My Account](#) [Search Menu](#) [New Case Search](#) [Refine Search](#) [Back](#)
Location : Galveston County [Images](#)**CASE SUMMARY****CASE NO. 15-CV-0378**

Arnoldo Garza, Et Al vs. Jose E. Manzanares, Et Al

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\$

Case Type: **Injury/Damage - Motor Vehicle**  
 Date Filed: **04/17/2015**  
 Location: **10th District Court**  
 Judicial Officer: **Neves, Kerry**

**PARTY INFORMATION**

		Lead Attorneys
<b>Defendant</b>	<b>Liberty Freight Company Inc.</b> C/O Registered Agent Tamela Costoulas 13427 1/2 Pumice Street Norwalk, CA 90650	
<b>Defendant</b>	<b>Manzanares, Jose E.</b> 8332 Bennett St. Fontana, CA 92335	
<b>Plaintiff</b>	<b>Garza, Arnoldo</b> 5300 Memorial Drive Suite 890 Houston, TX 77007	<b>David M. Medina</b> <i>Retained</i> 713-653-3147(W) 713-862-1002(F) davidmedina@justicedavidmedi
<b>Plaintiff</b>	<b>Garza, Francisca</b> 5300 Memorial Drive, Suite 890 Houston, TX 77007	<b>David M. Medina</b> <i>Retained</i> 713-653-3147(W) 713-862-1002(F) davidmedina@justicedavidmedi

**EVENTS & ORDERS OF THE COURT**

		OTHER EVENTS AND HEARINGS
04/17/2015	<b>Original Petition - OCA</b> <i>Petition and Jury Demand-Atty to send request for service once case # received-pd for 2 @ 65 and copy fees</i>	
04/17/2015	<b>OCA Case Information Sheet</b> <i>Civil Case Info Sheet</i>	
04/17/2015	<b>Request for Civil Service</b> <i>1 Citation by C/M. Assigned to R.K.</i>	
04/17/2015	<b>Request for Civil Service</b> <i>Request for Issuance of 1 Citation by C/M; Assigned to R.K.</i>	
04/17/2015	<b>Citation by Certified Mail Issuance - Work Product</b> <i>Issued 2 Citations Along with S/C Sheet and Mailed by C/M. RK</i>	
04/21/2015	<b>Notice - From Court of Setting Date</b> (Judicial Officer: Neves, Kerry) <i>Status Conference on 07/09/15 @ 9:00 AM</i>	
04/24/2015	<b>Citation and Return</b>	
05/04/2015	<b>Citation and Return</b>	
07/09/2015	<b>Status Conference</b> (9:00 AM) (Judicial Officer Neves, Kerry) <b>IN-PERSON ATTENDANCE BY COUNSEL IS MANDATORY. FAILURE TO DO SO MAY RESULT IN DISMISSAL FOR WANT OF PROSECUTION.</b>	

Unofficial Record

## Galveston County - 10th District Court

FILED: 4/17/2015 11:06:42 AM  
 JOHN D. KINARD - District Clerk  
 Galveston County, Texas  
 Envelope No. 4930523  
 By: Shailja Dixit  
 4/17/2015 11:24:24 AM

# 15-CV-0378

CAUSE NUMBER (FOR CLERK USE ONLY):

COURT (FOR CLERK USE ONLY):

STYLED:

Arnelo Garza and Francisca Garza v.  
Jose E. Manzaneres and Liberty Freight Company, Inc.  
 (e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment motion for modification or enforcement is filed in a family law case. The information should be the best available at the time of filing. This sheet, approved by the Texas Judicial Council, is intended to collect information that will be used for statistical purposes only. It neither replaces nor supplements the filings or service of pleading or other documents as required by law or rule. The sheet does not constitute a discovery request, response, or supplementation, and it is not admissible at trial.

<b>1. Contact information for person completing case information sheet:</b> Name: <u>DAVID M. MEDINA</u> Email: <u>davidmedina@justicedavidmedina.com</u> Address: <u>5300 Memorial Drive, Suite 890</u> Telephone: <u>713-980-5300</u> City/State/Zip: <u>Houston, TX 77007</u> Fax: <u>713-583-5915</u> Signature: <u>David M. Medina</u> State Bar No: <u>88</u>		<b>Names of parties in case:</b> Plaintiff(s)/Petitioner(s): <u>ARNOLDO GARZA and FRANCISCA GARZA</u> Defendant(s)/Respondent(s): <u>JOSE E. MANZANARES and LIBERTY FREIGHT COMPANY, INC.</u> [Attach additional page as necessary to list all parties]		<b>Person or entity completing sheet is:</b> <input checked="" type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agency <input type="checkbox"/> Other: _____ Additional Parties in Child Support Case: Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____					
<b>2. Indicate case type, or identify the most important issue in the case (select only 1):</b>									
<b>Civil</b>			<b>Family Law</b>						
<b>Contract</b> <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ <input type="checkbox"/> Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____		<b>Injury or Damage</b> <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation <input type="checkbox"/> Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: _____ <input checked="" type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises <input type="checkbox"/> Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability <input type="checkbox"/> List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____		<b>Real Property</b> <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ <b>Related to Criminal Matters</b> <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____		<b>Marriage Relationship</b> <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void <b>Divorce</b> <input type="checkbox"/> With Children <input type="checkbox"/> No Children <b>Other Family Law</b> <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____		<b>Post-judgment Actions (non-Title IV-D)</b> <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other <b>Title IV-D</b> <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order <b>Parent-Child Relationship</b> <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Paternity/Parentage <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
<b>Employment</b> <input type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		<b>Other Civil</b> <input type="checkbox"/> Administrative Appeal <input type="checkbox"/> Antitrust/Unfair Competition <input type="checkbox"/> Code Violations <input type="checkbox"/> Foreign Judgment <input type="checkbox"/> Intellectual Property <input type="checkbox"/> Lawyer Discipline <input type="checkbox"/> Perpetrate Testimony <input type="checkbox"/> Securities/Stock <input type="checkbox"/> Tortious Interference <input type="checkbox"/> Other: _____							
<b>Tax</b> <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____		<b>Probate &amp; Mental Health</b> <b>Probate/Wills/Intestate Administration</b> <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____							
<b>3. Indicate procedure or remedy, if applicable (may select more than 1):</b>									
<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action		<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment		<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover					

Assigned to R.K.

Filed: 4/17/2015 11:06:42 AM  
JOHN D. KINARD - District Clerk

Galveston County, Texas

Envelope No. 4930523

By: Shailja Dixit

4/17/2015 11:24:24 AM



# JOHN D. KINARD

## DISTRICT CLERK GALVESTON COUNTY

## REQUEST FOR ISSUANCE OF SERVICE

Date Requested: 4/16/15 Galveston County - 10th District Court  
 Case Number: 15-CV-0378 Court Description: \_\_\_\_\_  
 Type of Instrument to be served: Petition (original)

## SERVICE TO BE ISSUED ON (Please list exactly as the name appears in the pleading to be served)

Issue Service To: Jose E. Manzanares  
 Address of Service: 8332 Bennett St.  
 City, State & Zip: Fontana, CA 92335  
 Agent (IF APPLICABLE) \_\_\_\_\_

## TYPE OF SERVICE TO BE ISSUED:

## Non Writs:

- ☒ Citation ☐ Alias Citation ☐ Pluries Citation ☐ Citation by Publication ☐ Secretary of State Citation  
☐ Notice ☐ Precept ☐ Rule 106 Service ☐ Subpoena

## Writs:

- ☐ Attachment (Person) ☐ Attachment (Property) ☐ Attachment (Witness) ☐ Certiorari  
☐ Garnishment (Prejudgment) ☐ Habeas Corpus ☐ Injunction ☐ Temporary Restraining Order  
☐ Possession (Person) ☐ Possession (Property) ☐ Protective Order (Family) ☐ Protective Order (Civil)  
☐ Scire Facias ☐ Sequestration ☐ Supersedeas  
☐ Other (Please Describe): \_\_\_\_\_

## UPON ISSUANCE OF SERVICE: (CHECK ONE ONLY)

☐ Send to Sheriff

Note: Citation(s) to be served by Constable will be RETURNED TO REQUESTOR to make arrangements to deliver and make payment for service directly with the Constable

☐ Civil Process Server (Include the name of the Authorized Person to pick-up): \_\_\_\_\_☐ Call attorney for pick up (Phone Number): \_\_\_\_\_☐ Mail to attorney at: \_\_\_\_\_  
(Please include a self addressed stamped envelope): \_\_\_\_\_☒ District Clerk serve by certified mail

## ISSUANCE OF SERVICE REQUESTED BY:

Attorney/Party Name: David M. MedinaLaw Firm (if applicable): The Medina Law Firm Bar Number: 88Address: 5300 Memorial Dr, Suite 890  
Houston TX 77007Phone Number: 713 653-3147 Email Address: davidmedina@justicedavid

\*\*\*Service will only be issued upon payment of costs\*\*\*

medina.com

Date Fees Paid: \_\_\_\_\_ Amount: \_\_\_\_\_ Method of Payment: \_\_\_\_\_

Signature of Attorney Requesting service: \_\_\_\_\_

Assigned to R.K.

Filed: 4/17/2015 11:06:42 AM  
 JOHN D. KINARD - District Clerk  
 Galveston County, Texas  
 Envelope No. 4930523  
 By: Shailja Dixit  
 4/17/2015 11:24:24 AM



**JOHN D. KINARD**  
**DISTRICT CLERK GALVESTON COUNTY**

## REQUEST FOR ISSUANCE OF SERVICE

Date Requested: 4/10/15 Galveston County - 10th District Court  
 Case Number: 15-CV-0378 Court Description: \_\_\_\_\_  
 Type of Instrument to be served: Original Petition

## SERVICE TO BE ISSUED ON (Please list exactly as the name appears in the pleading to be served)

Issue Service To: Liberty Freight Company, Inc  
 Address of Service: 13427 1/2 Pomice St  
 City, State & Zip: Norwalk, CA 90650  
 Agent (IF APPLICABLE) Tamela Costoulas

## TYPE OF SERVICE TO BE ISSUED:

**Non Writ:**

- ☒ Citation ☐ Alias Citation ☐ Pluries Citation ☐ Citation by Publication ☐ Secretary of State Citation  
☐ Notice ☐ Precept ☐ Rule 106 Service ☐ Subpoena

**Writ:**

- ☐ Attachment (Person) ☐ Attachment (Property) ☐ Attachment (Witness) ☐ Certiorari  
☐ Garnishment (Prejudgment) ☐ Habeas Corpus ☐ Injunction ☐ Temporary Restraining Order  
☐ Possession (Person) ☐ Possession (Property) ☐ Protective Order (Family) ☐ Protective Order (Civil)  
☐ Scire Facias ☐ Sequestration ☐ Supersedeas  
☐ Other (Please Describe): \_\_\_\_\_

## UPON ISSUANCE OF SERVICE: (CHECK ONE ONLY)

☐ Send to Sheriff

Note: Citation(s) to be served by Constable will be RETURNED TO REQUESTOR to make arrangements to deliver and make payment for service directly with the Constable

☐ Civil Process Server (Include the name of the Authorized Person to pick-up): \_\_\_\_\_☐ Call attorney for pick up (Phone Number): \_\_\_\_\_☐ Mail to attorney at: \_\_\_\_\_

(Please include a self addressed stamped envelope): \_\_\_\_\_

☒ District Clerk serve by certified mail

## ISSUANCE OF SERVICE REQUESTED BY:

Attorney/Party Name: David M. Medina  
 Law Firm (if applicable): The Medina Law Firm Bar Number: 88  
 Address: 5300 Memorial Drive Suite 890  
Houston TX 77007

Phone Number: 713 653 3147 Email Address: david.medina@justice.david.medina.com  
 \*\*\*Service will only be issued upon payment of costs\*\*\*

Date Fees Paid: \_\_\_\_\_ Amount: \_\_\_\_\_ Method of Payment: \_\_\_\_\_

Signature of Attorney Requesting service: \_\_\_\_\_

CAUSE NO. 15-CV-0378

ARNOLDO GARZA AND FRANCISCA	§	IN THE DISTRICT COURT OF
GARZA	§	
PLAINTIFFS	§	
	§	
V.	§	GALVESTON COUNTY, T E X A S
	§	
JOSE E. MANZANARES AND	§	Galveston County - 10th District Court
LIBERTY FREIGHT COMPANY, INC.	§	
DEFENDANTS	§	_____ JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiffs, ARNOLDO GARZA and FRANCISCA GARZA, complaining of Defendants, JOSE E. MANZANARES and LIBERTY FREIGHT COMPANY, INC. and for cause of action show unto the Court the following:

**DISCOVERY**

1. Plaintiffs intend that discovery be conducted under Discovery Level 2.

**PARTIES AND SERVICE**

2. Plaintiffs Arnolando Garza and Francisca Garza are residents of Galveston County, Texas.
3. Defendant, JOSE E. MANZANARES, is an individual and is a resident of California and may be served with process at 8332 Bennett St. Fontana, CA 92335.
4. Defendant, LIBERTY FREIGHT COMPANY, INC. is a foreign Corporation or similar entity, with an office and place of business in California, with the power to sue and

be sued, which regularly does business in Texas and the United States as a transport company and is not registered to do business in the State of Texas, and does not maintain a Texas designated agent on whom service may be made, and thus may be served through Tex. Civ. Prac. Rem. Code 7.044, through the Secretary of State of Texas under the Texas Long Arm Statute, and through its registered agent Tamela Costoulas at 13427 ½ Pumice Street, Norwalk, CA 90650.

### **JURISDICTION AND VENUE**

5. The subject matter in controversy is within the jurisdictional limits of this court. This Court has jurisdiction over the parties because the Plaintiffs are Texas residents and venue in Galveston County is proper because Plaintiffs reside in Galveston County and because a substantial part of Plaintiffs' cause of action has occurred or arose in Galveston County, Texas.

### **FACTS**

6. On or about August 31, 2013, the Plaintiffs were traveling West on Interstate 10 in Kimble County when their vehicle was struck violently from behind by the vehicle driven by Jose E. Manzanares. The first violent impact caused the Plaintiffs' vehicle to veer out of control and spin when Defendants' vehicle struck Plaintiff's vehicle a second time.

### **FIRST CAUSE OF ACTION - NEGLIGENCE BY JOSE E. MANZANARES**

7. Jose E. Manzanares breached his duty of care owed to the Plaintiffs and others, in failing to operate his vehicle with a reasonable care. The driver should have reasonably

foreseen his acts and omissions would be the proximate cause of an accident and damages to the Plaintiffs and others. Jose E. Manzanares failed to use ordinary care in his acts and omissions including, but not limited to, the following:

- a. In speeding and driving recklessly;
- b. In violating the Texas Transportation Code, Federal Motor Carrier Safety Regulations, as well as other rules and regulations; and
- c. Endangering the safety of others on the road.

**SECOND CAUSE OF ACTION -  
RESPONDEAT SUPERIOR**

8. At the time of the incident Jose E. Manzanares was an employee of Liberty Freight Company, Inc., and he was working within the scope of his employment and at their direction when the incident occurred. Therefore, Liberty Freight Company, Inc., is liable to the Plaintiffs for their injuries and other damages under theories of Respondeat Superior or Agency for Jose E. Manzanares' negligence and other conduct. In the alternative, if Jose E. Manzanares was an independent contractor of Liberty Freight Company, Inc., then it is liable under the theories of agency for Jose E. Manzanares' acts and omissions as described.

**THIRD CAUSE OF ACTION -  
NEGLIGENT ENTRUSTMENT, NEGLIGENT TRAINING,  
MANAGEMENT AND SUPERVISION**

9. The injuries and damages sustained by the Plaintiffs were caused by the negligent entrustment of the vehicle by Liberty Freight Company, Inc., as well as the negligent training, management, and supervision of Jose E. Manzanares.



**DAMAGES**

10. As a direct and proximate result of the above aforementioned negligence the Plaintiffs' sustained injuries and other damages as follows:

- a. Pain and Suffering and mental anguish (past & future);
- b. Physical Disfigurement and Impairment (past & future);
- c. Reasonable and Necessary Medical Expenses (past & future);
- d. Lost Wages in the past; and
- e. Diminution of future earning capacity.

**REQUEST FOR PRODUCTION**

11. The Plaintiffs hereby requests each Defendant to respond fully to the following Request for Production within 50 days of being served with this document pursuant to the Texas Rules of Civil Procedure:

**Request for Production One:** Please provide true and correct copies of any and all photographs of the Defendants vehicle damage related to the collision made the basis of this suit.

**RESPONSE:**

**Request for Production Two:** Please provide true and correct copies of Jose E. Manzanares' driver's license.

**RESPONSE:**

**Request for Production Three:** Please provide true and correct copies of any and all employment contracts in effect related to Jose E. Manzanares' scope of work at the time of the collision made the basis of this suit.

**RESPONSE:**

**Request for Production Four:** Please provide true and correct copies of any and all independent contractor agreements in place Jose E. Manzanares had at the time related to the scope of work performed by Jose E. Manzanares at the time of the collision made the basis of this suit.



**RESPONSE:**

**Request for Production Five:** Please provide true and correct copies of any and all titles to vehicles and/or trailers that were driven by Jose E. Manzanares at the time of collision made the basis of this suit.

**RESPONSE:**

**Request for Production Six:** Please provide true and correct copies of any and all estimates for repair to the Defendants vehicles involved in the collision made the basis of this suit.

**RESPONSE:**

**Request for Production Seven:** Please provide true and correct copies of any and all training manuals provided to Jose E. Manzanares prior to the time of the collision made the basis of this suit.

**RESPONSE:**

**Request for Production Eight:** Please provide true and correct copies of any and all documents reflecting the goods Jose E. Manzanares was transporting at the time of the collision made the basis of this suit.

**RESPONSE:**

**Request for Production Nine:** Please provide true and correct copies of any and all photographs or video/audio recordings you have of the Plaintiffs or Jose E. Manzanares.

**RESPONSE:**

**Request for Production Ten:** Please provide true and correct copies of any and all employment applications related to Jose E. Manzanares prior to the date of the collision made the basis of this suit.

**RESPONSE:**

**Request for Production Eleven:** Please provide true and correct copies of any and all cell phone records relating to the cellular telephone owned or used by Jose E. Manzanares on the date of the collision made the basis of this suit.

**RESPONSE:**

**REQUEST FOR DISCLOSURE**

12. The Plaintiffs hereby requests each Defendant to respond fully to all information contained in Rule 194.2 of the Texas Rules of Civil Procedure.

**JURY DEMAND**

Plaintiffs hereby demand trial by jury.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays the Defendants be cited herein in terms of the law to appear and answer herein and that upon final trial on the merits, Plaintiffs obtain judgment against Defendants for the following:

- a. monetary relief over \$200,000 but not more than \$1,000,000;
- b. pre-judgment and post-judgment interest thereon at the maximum legal rate;
- c. costs of Court; and
- d. such other and further relief, special and general at law and in equity to which

Plaintiffs may be justly entitled.

Respectfully Submitted,

**THE MEDINA LAW FIRM**

By: /s/ David M. Medina

**DAVID M. MEDINA**

SBN: 88

5300 Memorial Drive, Suite 890

Houston, Texas 77007

Telephone: 713-653-3147

Facsimile: 713-862-1002

[davidmedina@justicedavidmedina.com](mailto:davidmedina@justicedavidmedina.com)

**THE RIEBSCHLAGER LAW FIRM, PC**

GARY M. RIEBSCHLAGER

801 Congress St., Suite 250

Houston, Texas 77002

Telephone: (281) 904-1404

Email: [gary@riebschlagelaw.com](mailto:gary@riebschlagelaw.com)

**ATTORNEYS FOR PLAINTIFFS**

**ARNOLDO GARZA AND  
FRANCISCA GARZA**

**CITATION BY CERTIFIED MAIL (TRC 106)**

**THE STATE OF TEXAS**

Cause No: 15-CV-0378

10th District Court of Galveston County

ARNOLDO GARZA, ET AL VS. JOSE E. MANZANARES, ET AL

TO: **Jose E. Manzanares** 8332 Bennett St Fontana CA 92335

Defendant Greetings:

**NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 am on the Monday next following the expiration of 20 days after the date you were served this citation and petition, a default judgment may be taken against you." TRCP. 99**

You are hereby commanded to appear by filing a written answer to the Plaintiff's Petition at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation before the 10th District Court of Galveston County, at the Courthouse in said County in Galveston, Texas. Said Plaintiff's **Original Petition - OCA** was filed in said court on the **17th day of April, 2015** in the above entitled cause.

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition - OCA accompany this citation and made a part hereof.

Issued and given under my hand and the seal of the Said Court at Galveston, Texas, on the **17th day of April, 2015**.

Issued at the request of  
David M Medina  
The Medina Law Firm  
5300 Memorial Drive Suite 890  
Houston TX 77007



**John D. Kinard**, District Clerk  
Galveston County, Texas

*Rolande Kain*

By: \_\_\_\_\_

Rolande Kain, Deputy

**SEE ATTACHED FORM**

**NOTE: Status Conference set: 07/09/2015**

**CERTIFICATE OF DELIVERY BY CERTIFIED MAIL**

Came to hand on the **4/17/2015** at **3:00** o'clock **P. M.** and executed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M., by mailing the same to Jose E. Manzanares, Defendant by registered or **certified mail article number 7196 9008 9111 2751 1181**, with delivery restricted to addressee only, return receipt requested, a true copy of this citation with a copy of the petition were attached thereto.

Fee-Serving: \$ \_\_\_\_\_

**JOHN D. KINARD, District Clerk Galveston County, Texas**  
Authorized Person

BY: \_\_\_\_\_, Deputy Clerk

**CITATION BY CERTIFIED MAIL (TRC 106)**

**THE STATE OF TEXAS**

Cause No: 15-CV-0378

10th District Court of Galveston County

ARNOLDO GARZA, ET AL VS. JOSE E. MANZANARES, ET AL

TO: **Liberty Freight Company Inc.** C/O Registered Agent Tamela Costoulas 13427 1/2 Pumice Street Norwalk CA 90650

Defendant Greetings:

**NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 am on the Monday next following the expiration of 20 day after the date you were served this citation and petition, a default judgment may be taken against you." TRCP. 99**

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The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition - OCA accompany this citation and made a part hereof.

Issued and given under my hand and the seal of the Said Court at Galveston, Texas, on the **17th day of April, 2015.**

Issued at the request of  
David M Medina  
The Medina Law Firm  
5300 Memorial Drive Suite 890  
Houston TX 77007



**John D. Kinard**, District Clerk  
Galveston County, Texas

*Rolande Kain*

By: \_\_\_\_\_

Rolande Kain, Deputy

**SEE ATTACHED FORM**

**NOTE: Status Conference set: 07/09/2015**

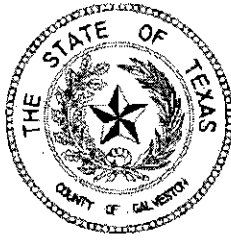
**CERTIFICATE OF DELIVERY BY CERTIFIED MAIL**

Came to hand on the 4/17/2015 at 3:00 o'clock **P. M.** and executed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_, at \_\_\_\_\_ o'clock \_\_\_\_ M., by mailing the same to Liberty Freight Company Inc., Defendant by registered or **certified mail article number 7196 9008 9111 2751 1198**, with delivery restricted to addressee only, return receipt requested, a true copy of this citation with a copy of the petition were attached thereto.

Fee-Serving: \$ \_\_\_\_\_

**JOHN D. KINARD, District Clerk Galveston County, Texas**  
Authorized Person

BY: \_\_\_\_\_, Deputy Clerk



**10<sup>th</sup> Judicial District Court**  
Galveston, County, Texas

15 APR 21 PM 3:14

*[Signature]*  
DISTRICT CLERK  
GALVESTON COUNTY, TEXAS

**Kerry Neves**  
Judge

**NOTICE OF CASE SETTING/ACTION**

April 20, 2015

DAVID M. MEDINA  
THE MEDINA LAW FIRM  
5300 MEMORIAL DRIVE SUITE 890  
HOUSTON TX 77007

Fax: 713-583-5915  
Email: davidmedina@justicedavidmedina.com

CASE NUMBER: 15-CV-0378

CASE STYLE: ARNOLDO GARZA, ET AL VS. JOSE E. MANZANARES, ET AL

DATE: July 09, 2015 TIME: 9:00 AM

TYPE OF SETTING/ACTION: STATUS CONFERENCE. IN-PERSON ATTENDANCE BY COUNSEL IS MANDATORY. FAILURE TO DO SO MAY RESULT IN DISMISSAL FOR WANT OF PROSECUTION.

It is the Plaintiff's responsibility to give notice to all parties as they are served and/or answer.

FROM: Lori Wilson  
COURT COORDINATOR  
10<sup>TH</sup> JUDICIAL DISTRICT COURT  
600 59<sup>TH</sup> ST, 4th FLOOR  
GALVESTON, TX 77551  
(409) 766-2230

RETURN TO FAX NO.: (409) 770-5266

**CONFIDENTIALITY NOTE**

The information contained in this facsimile message is legally privileged and confidential information intended only for the use of the individual or entity named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copy of this facsimile is strictly prohibited. If you have received this facsimile in error, please notify us immediately and we will arrange to retrieve the document from you.

15-CV-0378  
DCNOFCS  
Notice - From Court of Setting Date  
1025961



# Xerox WorkCentre 5330

## Transmission Report

Date & Time : 04/20/2015 4:26 PM  
Page : 1(Last Page)

The job has been sent.

Job Date & Time

04/20/2015 4:25 PM



10<sup>th</sup> Judicial District Court  
Galveston, County, Texas

Kerry Neves  
Judge

### NOTICE OF CASE SETTING/ACTION

April 20, 2015

DAVID M. MEDINA  
THE MEDINA LAW FIRM  
5300 MEMORIAL DRIVE SUITE 890  
HOUSTON TX 77007

Fax: 713-583-5915  
Email: davidmedina@justicedavidmedina.com

CASE NUMBER: 15-CV-0378

CASE STYLE: ARNOLDO GARZA, ET AL VS. JOSE E. MANZANARES, ET AL

DATE: July 09, 2015 TIME: 8:00 AM

TYPE OF SETTING/ACTION: STATUS CONFERENCE. IN-PERSON ATTENDANCE BY COUNSEL  
IS MANDATORY. FAILURE TO DO SO MAY RESULT IN DISMISSAL FOR WANT OF  
PROSECUTION.

It is the Plaintiff's responsibility to give notice to all parties as they are served and/or answer.

FROM: Lori Wilson  
COURT COORDINATOR  
10<sup>TH</sup> JUDICIAL DISTRICT COURT  
600 59<sup>TH</sup> ST, 4th FLOOR  
GALVESTON, TX 77551  
(409) 766-2230

RETURN TO FAX NO.: (409) 770-5266

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Date & Time Sent  
04/20/2015 4:26 PM

Recipient Information  
davidmedina@justicedavidmedina.com

Result  
Completed



# FAX CONFIRMATION

Result: **Success**

## Sent by:

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Voice Number:  
Fax Number:  
RightFax ID: WALKUP

## Sent to:

Name: Fax User  
Company:  
Number/Address: 7135835915  
Voice Number:  
Remote CSID: 17135835915



10<sup>th</sup> Judicial District Court  
Galveston, County, Texas

Kerry Neves  
Judge

### NOTICE OF CASE SETTING/ACTION

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THE MEDINA LAW FIRM  
5300 MEMORIAL DRIVE SUITE 890  
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Email: davidmedina@justicedavidmedina.com

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It is the Plaintiff's responsibility to give notice to all parties as they are served and/or answer.

FROM: Lori Wilson  
COURT COORDINATOR  
10<sup>th</sup> JUDICIAL DISTRICT COURT  
800 59<sup>th</sup> ST, 4th FLOOR  
GALVESTON, TX 77551  
(409) 766-2230

RETURN TO FAX NO.: (409) 770-8268

#### CONFIDENTIALITY NOTE

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Fax Channel: 3  
Scanning Device: 172.21.26.48  
Scanned at: 04/20/15 16:23:30  
Submitted at: 04/20/15 16:23:30  
Completed at: 04/20/15 16:23:39

## CITATION BY CERTIFIED MAIL (TRC 106)

THE STATE OF TEXAS

Cause No: 15-CV-0378

10th District Court of Galveston County

ARNOLDO GARZA, ET AL VS. JOSE E. MANZANARES, ET AL

TO: Jose E. Manzanares 8332 Bennett St Fontana CA 92335

Defendant Greetings:

**NOTICE TO DEFENDANT:** "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 am on the Monday next following the expiration of 20 day after the date you were served this citation and petition, a default judgment may be taken against you." TRCP. 99

You are hereby commanded to appear by filing a written answer to the Plaintiff's Petition at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation before the 10th District Court of Galveston County, at the Courthouse in said County in Galveston, Texas. Said Plaintiff's **Original Petition - OCA** was filed in said court on the **17th day of April, 2015** in the above entitled cause.

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition - OCA accompany this citation and made a part hereof.

Issued and given under my hand and the seal of the Said Court at Galveston, Texas, on the **17th day of April, 2015**.

Issued at the request of  
David M Medina  
The Medina Law Firm  
5300 Memorial Drive Suite 890  
Houston TX 77007



John D. Kinard, District Clerk  
Galveston County, Texas

By:

*Rolande Kain*  
Rolande Kain, Deputy

SEE ATTACHED FORM

NOTE: Status Conference set: 07/09/2015

## CERTIFICATE OF DELIVERY BY CERTIFIED MAIL

Came to hand on the 4/17/2015 at 3:00 o'clock P. M. and executed on the 30 day of April, 2015, at      o'clock      M., by mailing the same to Jose E. Manzanares, Defendant by registered or certified mail article number **7196 9008 9111 2751 1181**, with delivery restricted to addressee only, return receipt requested, a true copy of this citation with a copy of the petition were attached thereto.

Fee-Serving:

\$ 6500

JOHN D. KINARD, District Clerk Galveston County, Texas  
Authorized Person

BY:


*Rolande Kain* Deputy Clerk

Certified Article Number

7196 9008 9111 2751 1181

15-CV-0378  
DCCIR  
Citation and Return  
1032619




2. Article Number		COMPLETE THIS SECTION ON DELIVERY	
 7196 9008 9111 2751 1181		A. Received by (Please Print Clearly)	B. Date of Delivery 4/30/15
		C. Signature X <i>Rolande Kain</i>	
3. Service Type <b>CERTIFIED MAIL™</b>		<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes		D. Is delivery address different from item 1? If YES, enter delivery address below:	
1. Article Addressed to:			
Jose E. Manzanares 8332 Bennett St Fontana, CA 92335		<b>Reference Information</b>  15-CV-0378  Rolande Kain	
PS Form 3811, January 2005		Domestic Return Receipt	

UNITED STATES POSTAL SERVICE

CA 924

30 APR '15

PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW

  
**JOHN D KINARD**  
**GALVESTON COUNTY DISTRICT CLERK**  
**600 59TH STREET SUITE 4001**  
**PO BOX 17250**  
**GALVESTON TX 77551-4019**

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15 MAY - 4 PM '15  
50

**CITATION BY CERTIFIED MAIL (TRC 106)**

THE STATE OF TEXAS

Cause No: 15-CV-0378

10th District Court of Galveston County

ARNOLDO GARZA, ET AL VS. JOSE E. MANZANARES, ET AL

TO: Liberty Freight Company Inc. C/O Registered Agent Tamela Costoulas 13427 1/2 Pumice Street Norwalk CA 90650

Defendant Greetings:

**NOTICE TO DEFENDANT: "You have been sued. You may employ an attorney. If you or your attorney do not file a written answer with the clerk who issued this citation by 10:00 am on the Monday next following the expiration of 20 day after the date you were served this citation and petition, a default judgment may be taken against you." TRCP. 99**

You are hereby commanded to appear by filing a written answer to the Plaintiff's Petition at or before 10:00 o'clock A.M. on the Monday next after the expiration of 20 days after the date of service of this citation before the 10th District Court of Galveston County, at the Courthouse in said County in Galveston, Texas. Said Plaintiff's Original Petition - OCA was filed in said court on the 17th day of April, 2015 in the above entitled cause.

The nature of Plaintiff's demand is fully shown by a true and correct copy of Plaintiff's Original Petition - OCA accompany this citation and made a part hereof.

Issued and given under my hand and the seal of the Said Court at Galveston, Texas, on the 17th day of April, 2015.

Issued at the request of  
David M Medina  
The Medina Law Firm  
5300 Memorial Drive Suite 890  
Houston TX 77007



John D. Kinard, District Clerk  
Galveston County, Texas

By: Rolande Kain  
Rolande Kain, Deputy

SEE ATTACHED FORM

NOTE: Status Conference set: 07/09/2015

**CERTIFICATE OF DELIVERY BY CERTIFIED MAIL**

Came to hand on the 4/17/2015 at 3:00 o'clock P. M. and executed on the 20th day of APRIL, 2015, at     o'clock     M., by mailing the same to Liberty Freight Company Inc., Defendant by registered or certified mail article number **7196 9008 9111 2751 1198**, with delivery restricted to addressee only, return receipt requested, a true copy of this citation with a copy of the petition were attached thereto.

Fee-Serving:

\$ 65.00

JOHN D. KINARD, District Clerk Galveston County, Texas  
Authorized Person

BY:

Rolande Kain Deputy Clerk


Certified Article Number

7196 9008 9111 2751 1198

SENDERS RECORD

15-CV-0378  
DCCIR  
Citation and Return  
1029138



2. Article Number		COMPLETE THIS SECTION ON DELIVERY	
		A. Received by (Please Print Clearly)	B. Date of Delivery
7196 9008 9111 2751 1198			4/20/15
3. Service Type <b>CERTIFIED MAIL™</b>		C. Signature	
4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes		<i>Tamela Costoulas</i>	
1. Article Addressed to:		<input type="checkbox"/> Agent <input checked="" type="checkbox"/> Addressee	
Liberty Freight Company Inc. C/O Registered Agent Tamela Costoulas 13427 1/2 Pumice Street Norwalk, CA 90650		D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No	
		<b>Reference Information</b>	
		15-CV-0378	
		Rolande Kain	
PS Form 3811, January 2005		Domestic Return Receipt	

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● PRINT YOUR NAME, ADDRESS AND ZIP CODE BELOW ●

  
 JOHN D KINARD  
 GALVESTON COUNTY DISTRICT CLERK  
 600 59TH STREET SUITE 4001  
 PO BOX 17250  
 GALVESTON TX 77551-4610

APR 24 PM 2:44  
 DISTRICT CLERK  
 GALVESTON COUNTY, TEXAS